



County of San Diego

*Copy
cc.
LAURA*

J. WILLIAM COX, M.D., Ph.D.
DIRECTOR
(619) 236-2237

DEPARTMENT OF HEALTH SERVICES

STEVEN A. ESCOBOZA
ASSISTANT DIRECTOR
(619) 236-7633

1700 PACIFIC HIGHWAY, SAN DIEGO, CALIFORNIA 92101-2417

ENVIRONMENTAL HEALTH SERVICES
HAZARDOUS MATERIALS MANAGEMENT DIVISION
P.O. BOX 85261
SAN DIEGO, CA 92138-5261
(619) 338-2222

January 12, 1990

Gerry Hardacre
Environmental Resources Manager
General Dynamics-Convair Division
3302 Pacific Highway
San Diego, CA 92101

Dear Mr. Hardacre:

RE: Incident #89-583 / Acid Spill 12-31-89
3302 Pacific Highway-Bldg.#75.

NOTICE OF VIOLATION

This Notice of Violation is in response to the release from your facility of 10-12,000 gallons of aluminum etch solution contaminated with 5,000 gallons of sodium dichromate solution.

This incident is evidence that the current design and operation of your plating process in building #75 does not preclude the loss of hazardous materials to the environment. This constitutes a violation of Section 67120 of the California Code of Regulations (CCR), Title 22. In addition, by allowing the process tank spill containment area to be utilized for holding free liquids containing hazardous wastes, your facility is in violation of Section 66508 of Title 22, CCR.

In order to minimize the potential of another hazardous material incident and to ensure protection of the public health and safety and the environment the following actions are to be taken:

Gerry Hardacre

-2-

January 12, 1990

1) Submit a written site assessment report pursuant to Section 67145(j) of Title 22 CCR. This preliminary report must include details of the incident, a determination of the type and extent of contamination, and an assessment of actual or potential hazards to human health or the environment. This report must be submitted to this office by February 20, 1990. This case has been assigned to Darryl Fowler, of the Site Assessment and Mitigation Program of the HMMD.

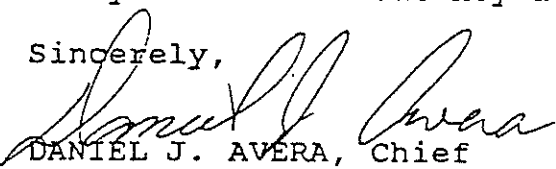
2) Submit a preliminary hazard assessment describing the immediate and long-term corrective action your facility will pursue for improving the design and operation of the processing operation in building #75. This must be accomplished by preparing and implementing a Risk Management and Prevention Program (RMPP). The preliminary hazard assessment describing the immediate corrective action must be submitted to Pat Hoy, of the Community Response Services Program of the HMMD, by March 1, 1990. The final RMPP must be submitted by January 5, 1991.

The RMPP is designed to minimize accidents involving acutely hazardous materials, and to develop plans to respond to on-site and off-site consequences should an accident occur. Chapter 6.95 of the California Health and Safety Code defines acutely hazardous materials (AHM), as all chemicals designated by the Environmental Protection Agency (EPA) as "extremely hazardous substances". Nitric acid and hydrofluoric acid are chemicals currently on EPA's list. Please refer to the "Advanced" RMPP Guidance document prepared by the State of California Office of Emergency Services.

The Hazardous Materials Management Division is responsible for protecting the public health and safety and the environment. The documents requested are intended to minimize the hazards associated with handling hazardous materials at your facility and to correct the violations noted. Your facility is currently in violation of the law and may be subject to further legal action. Failure to correct these violations in a timely manner may be a factor in determining the course of any legal action.

If you have any questions please contact me at (619) 338-2395, Darryl Fowler or Pat Hoy at (619) 338-2222.

Sincerely,


DANIEL J. AVERA, Chief
Hazardous Materials Management Division

DJA:dmc

cc: Nancy Riikonen-SD Metropolitan Industrial Waste
Jim Munch-Regional Water Quality Control Board
Pat Hoy/Christina Graulau-HMMD
Darryl Fowler/Ben Franklin-HMMD
H#04497 File

APPENDIX A

For the period January 1, 1987 to present, provide all original documents, reports, studies, drawings and the like, to include the original and all revisions as they relate to chemical processing, chemical handling and storage, chemical equipment and chemical materials and spills, located at General Dynamics Corporation, Convair Division, Building No. 75, Lindbergh Field Plant, San Diego, CA. These records should include, but not be limited to, the following:

1. All documents as they relate to inspection, maintenance, and/or repair of chemical processing equipment.
2. All documents, records, contracts, and the like as they relate to maintenance and/or repairs occurring to chemical tank No. 140 and all other processing equipment, storage equipment or containment equipment for chemicals.
3. All documents pertaining to the inspection, maintenance and/or repair of the concrete sump surrounding the area where chemical tank No. 140 is located.
4. All documents related to all chemical spills occurring in December 1989 at General Dynamics Corporation, Convair Division, Building No. 75, San Diego, CA.
5. All documents, reports of investigation, site plans, photographs, chemical test reports, worksheets and computer generated reports, which reference/relate in any way to the acid spill in December 1989, and any other hazardous spills or the discharge of hazardous materials to the sewer near or at Building No. 75.
6. All traveler documents or other records, related to any Government contract, indicating any parts which were processed in any way in Building No. 75.
7. All engineering studies, reports and the like, to include all drawings contained therein, as they relate to chemical material use and/or storage at Building No. 75.

AT 1:10 PM, SUNDAY DECEMBER 31, I RECEIVED A PAGE FROM STATION X TO CALL SAN DIEGO CITY FIRE DEPARTMENT. I CALLED 236-7773 AND TALKED TO CAPTAIN LEAP OF THE CITY HAZ MAT TEAM. HE INFORMED ME THAT GENERAL DYNAMICS EXPERIENCED AN ACID SPILL AND THAT THE POINT LOMA TREATMENT PLANT WAS TO BE NOTIFIED. THIS SPILL OCCURRED BETWEEN 9-10 AM ON DECEMBER 31. HE SAID THAT THEY WERE NOT GOING TO PURSUE THE MATTER ANY FURTHER BUT GAVE ME JOHN FIELDS NO. (2720842) OF GENERAL DYNAMICS FOR MORE INFORMATION. I TALKED TO JOHN FIELDS AND HE EXPLAINED TO ME WHAT THEY THOUGHT HAPPENED. HE SAID THAT A 15000 GALLON TANK CONTAINING ACID LEAKED INTO A SUMP WHICH CONTAINED 5000 GALLON OF SODIUM DICHROMATE. THE DICHROMATE SOLUTION CONTAINED APPROXIMATELY 1000PPM HEXAVALENT CHROMIUM. HE SAID THAT AFTER THE ACID LEAKED IT MIXED WITH THE SODIUM DICHROMATE WHICH WAS NOW APPROXIMATELY 300-500PPM HEXAVALENT CHROMIUM, CORRODED A GATE VALVE AND EMPTIED INTO THE SANITARY SEWER. HE THOUGHT A TOTAL OF 12,000 GALLON OF ACID AND 5000 GALLONS OF SODIUM DICHROMATE WAS LOST. I TOLD HIM I THOUGHT THIS WAS SIGNIFICANT AND THAT I SHOULD INVESTIGATE. HE GAVE ME KETH DE ARMONO'S NAME TO CALL WHEN ARRIVE AT THE PLANT. HE SAID HE WAS THE PLANTS MAINTENANCE SUPERVISOR. I PAGED MY BACK-UP JIM FRANK, INFORMED HIM OF THE SITUATION AND ASKED

HIM TO MEET ME AT THE PLANT. ON ARRIVING AT THE WEST GATE, I WAS MET BY CONVAIR FIRE FIGHTING TEAM. THEY WERE AWARE OF THE SPILL AND REMARKED THAT THEY DIDN'T KNOW WHO TO CALL. THEY DID NOT KNOW IF OTHER AGENCIES WERE CONTACTED. I ENTERED THE PLANT WITH KETH DE ARMOND, ^{AND} ONE FIRE FIGHTER IN THE CONVAIR VAN. MR. DE ARMOND SHOWED ME ACID ETCH TANK NO. 140 WHICH CONTAINED HNO_3 AND HCL . THE TANK IS INSIDE A BUILDING AND IS ADJACENT TO NUMEROUS OTHER ABOVE GROUND HORIZONTAL TANKS SURROUNDING BY A SERIES OF CONCRETE BERMS. THE PLANT AT THE TIME WAS SHUT DOWN AND THE BERMS LOOKED CLEAN. HE SHOWED ME A DRAW WHERE HE SAID THE ACID LEAKED INTO. I ASKED HIM ABOUT THE SODIUM DICHROMATE. HE SAID THERE WAS NO SODIUM DICHROMATE. JUST THE ACID ETCH SOLUTION LEAKED INTO THE SEWER. I INFORMED HIM THAT JOHN FIELDS TOLD ME THAT SODIUM DICHROMATE MIXED WITH THE ACID AND LEAKED INTO THE SEWER. HE WAS ADMITTING THAT THIS DID NOT HAPPEN. I ASKED HIM IF I COULD USE HIS PHONE TO CALL MR. FIELDS. HE SAID FINE. ON CALLING MR. FIELDS, I EXPLAINED TO HIM ABOUT THE SODIUM DICHROMATE. HE SAID SODIUM DICHROMATE WAS INVOLVED BUT MR. DE ARMOND DID NOT KNOW ABOUT IT. IN THE MEANTIME, STATION X WAS PAGING ME. THEY SAID THE POINT LOMA TREATMENT PLANT WANTED TO TALK TO ME. I CALLED THE TREATMENT PLANT AND SPOKE TO AN ASSISTANT OF MR. DALE (221 6672) HE INFORMED ME THAT GENERAL DYNAMICS REPORTED A SPILL AND THAT AN ACID SOLUTION CONTAINING HNO_3 & HCL OF APPROXIMATELY 12000 GALLONS AND ABOUT 5000 GALLONS OF SODIUM DICHROMATE WAS LOST TO THE SEWER. I TOLD HIM THAT WAS THE SAME INFORMATION JOHN FIELDS GAVE ME.

I THEN TALKED TO KEITH DE ARMOUD AND I QUESTIONED THE AREA OF THE PLANT HE WAS SHOWING ME. IT DIDN'T APPEAR TO REFLECT WHAT JOHN FIELDS DESCRIBED. HE SAID HE ONLY KNEW THAT TANK NO. 140 LEAKED AND DIDN'T KNOW ANYTHING ABOUT SODIUM DICHROMATE. I LEFT THE PLANT WITH A LOT OF UNANSWERED QUESTIONS AND WROTE UP MY HRT REPORT.

ON NEW YEAR'S DAY, STATION X PAGED ME AT APPROXIMATELY 11:40 AM. JERRY HARDACK (542-7712) WANTED TO KNOW IF I KNEW ABOUT THE ACID SPILL AT GENERAL DYNAMICS. I SAID I WAS OUT THERE YESTERDAY HIS TONE OF VOICE EXPRESSED SURPRISE. I TOLD HIM WHAT JOHN FIELDS SAID. HE SAID WHAT REALLY HAPPENED ~~WAS~~ WAS THAT ACID ETCH TANK NO. 140 LEAKED INTO THE CONCRETE BERM, THE BERM IN TURN HAD A HOLE AND THE ACID LEAKED INTO THE GROUND. HE SAID PACIFIC TREATMENT WAS OUT THERE NOW PUMPING OUT WHAT THEY COULD. HE SAID THE ACID NEVER WENT INTO THE SEWER. HE ALSO STATED THAT A CEMENT FINISHER WOULD BE CALLED TO REPAIR THE BERM, A CONTRACTOR TO RELINE THE ACID ETCH TANK AND A CONSULTANT TO PERFORM A SITE ASSESSMENT. HE CANDIDLY REMARKED THAT NO ENVIRONMENTAL DAMAGE OCCURRED SINCE THE SOIL IS ALKALINE, THE ACID WAS NEUTRALIZED WHEN IT LEAKED.

ON RETURNING TO WORK TUESDAY, I LEFT MESSAGES WITH DAN ADRA, CHUCK PRYHALZ, VICKY CALLENDER AND

KEN CALVERT ABOUT THE SITUATION. I, IN ADDITION,
MADE A SITE ASSESSMENT REFERRAL TO LARRY
BODENHAGEN OF THE SITE ASSESSMENT/MITIGATION UNIT.
I CALLED THE REGIONAL BOARD, JIM MURPHY, AND THE
CITY INDUSTRIAL WASTE, NANCY RIKOMEN AND INFORMED
THEM OF THE SITUATION. COPIES OF THE HAT REPORT
WERE ALSO GIVE TO BEN FRANKLIN OF THE FIELD
OPERATIONS UNIT.

MIKE/VERNOTT 1/5/90

County Health Dept.

NOTICE OF VIOLATION



County of San Diego

DEPARTMENT OF HEALTH SERVICES

1700 PACIFIC HIGHWAY, SAN DIEGO, CALIFORNIA 92101-2417

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Daniel Averca Chief HMM Division
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Sincerely,


DANIEL J. AVERA, Chief

Hazardous Materials Management Division

DJA:dmc

cc: Nancy Riikonen-SD Metropolitan Industrial Waste
Jim Munch-Regional Water Quality Control Board
Pat Hoy/Christina Graulau-HMMD
Darryl Fowler/Ben Franklin-HMMD
H#04497 File

HAZARDOUS MATERIAL INCIDENT RESPONSE
(HIRT)
HAZARDOUS MATERIALS INCIDENT RESPONSE REPORT

INCIDENT TYPE 02B

AGENCY-REPORT # FIRE/OTHER # SDFD # COUNTY # HIRT # 89-583

DATE 12/31/89 TOTAL TIME 3.5 + 2

TIME: INITIAL DISPATCH 1310 SCENE ARRIVAL 1420 RETURN HQTS TIME IN HQTS A + B

LOCATION 3302 Pacific Highway San Diego / 92101
Street City Thom Bros: Pg/Coord.

JURISDICTION: FIRE DISTRICT San Diego Fire PHONE # 236-7773
SCENE MGR INCIDENT COMMANDER

RESPONDING AGENCIES (Include Contact Person on Scene): County Haz Mat Mike Verneti
J. Frank

SEND BILL TO: NAME
COMPANY General Dynamics/Convair CONTACT PERSON J. Fields DRIVERS LIC. # ☐ CORP
ADDRESS 3302 Pacific Highway, San Diego PHONE 272-0842
PROPERTY OWNER PHONE
ADDRESS

HAZARDOUS MATERIALS: DESCRIPTION

Acid etch tank No. 140
Nitric Acid (HNO₃), HCL, Sodium Bicromate

REMARKS: (Include description and action taken)

Received call from Capt. Leap, San Diego Fire. General Dynamics reported an acid spill which occurred between 9:00 - 10:00 a.m. A 15000 gal acid etch tank leaked into a series of sumps which contained Sodium Bicromate. 12000 gal of Nitric Acid and 5000 gal Sodium Bicromate was lost into the sewer system. Apparently the acid corroded a gate valve in the sump causing the spill. This information was reported to me by John Fields of General Dynamics. A site investigation was made by Verneti and Keith De Armond, Maintenance Supervisor. Point Loma Treatment Facility was advised of the spill.

Persons contacted: John Field, General Dynamics 272-0842
Keith De Armond, General Dynamics 542-7742; Mr. Dale, Point Loma Treatment 221-6627

ADDITIONAL ACTION REQUIRED:

Referral to Nancy Rikomen of City Water Utilities and to HMMD Specialist
Manifest #

COPIES SENT TO:

OOP
CITY HAZ MAT

PERSON PREPARING REPORT:

Mike Verneti - HMMD

HIRT TEAM RECOMMENDS COST RECOVERY:
☒ Yes

COSTS: 5.5 x \$60.00 = \$330.00

☐ Proposition 65 Notification #
Designated Government Employee

☐ NARRATIVE ATTACHED

JAN 2 - 1990

HAZARDOUS MATERIALS INCIDENT RESPONSE REPORT

INCIDENT TYPE 02B

AGENCY-REPORT #: ☐ FIRE/OTHER # ☐ SDFD # ☐ COUNTY # ☐ HIRT # 89-58

DATE 1/1/90

TOTAL TIME 0.5 +

TIME: INITIAL DISPATCH SCENE ARRIVAL RETURN HQTS TIME IN HQTS A + B

LOCATION 3302 Pacific Hwy San Diego 92101
Street City

Thom Bros: Pg/Coord.

JURISDICTION: FIRE DISTRICT San Diego Fire PHONE #

SCENE MGR INCIDENT COMMANDER

RESPONDING AGENCIES (Include Contact Person on Scene): County Haz Mat

SEND BILL TO: NAME

COMPANY General Dynamics/Convair

CONTACT PERSON J. Hardacre

ADDRESS 3302 Pacific Highway, San Diego

PROPERTY OWNER

ADDRESS

DRIVERS LIC. #

PHONE 542-7712

PHONE

HAZARDOUS MATERIALS: DESCRIPTION

Acid Etch tank No. 140

Nitric Acid (HNO₃), Hydrochloric acid (HCL)

REMARKS: (Include description and action taken)

This is an update to Hirt Report dated 12/31/89. 'phone conversation with Jerry Hardacre, Environmental Mgr., General Dynamics/Convair. He explained to me that the acid etch solution spill did not go into the sewer system. It emptied through a hole in the concrete sump in the ground. Reports of 7000 to 12000 gallons were lost. Pacific Treatment is now pumping out what they can. A private contractor will be hired to perform soil sampling and extent of contamination. A cement contractor will repair the sump and another contractor will reline the acid etch tank. HE SAID SODIUM DICHRONATE WAS NOT INVOLVED IN THE SPILL, WHILE JOHN FIELDS SAID IT WAS.

ADDITIONAL ACTION REQUIRED:

Refer to SAM for follow up.

Referred to Regional Board - Jim Munch 265-5114 Manifest #

COPIES SENT TO:

OOP RWQCB
CITY HAZ MAT

PERSON PREPARING REPORT:

Mike Verneti - HMMD

HIRT TEAM RECOMMENDS COST RECOVERY:

☐ Yes

COSTS: 0.5 x \$60.00 = \$30.00

☐ Proposition 65 Notification #
Designated Government Employee

☐ NARRATIVE ATTACHED